

ANDERSON KILL & OLICK, P.C.

Attorneys and Counselors at Law

ONE GATEWAY CENTER, SUITE 1510 ■ NEWARK, NJ 07102
TELEPHONE: 973-642-5858 ■ FAX: 973-621-6361
www.andersonkill.com

Robert D. Chesler, Esq.
Rchesler@andersonkill.com
973-642-5864

Via ECF

June 17, 2013

Hon. Steven C. Mannion, U.S.M.J.
United States District Court, District of New Jersey
50 Walnut Street, Room 4062
Newark, NJ 07101

Re: *Gregory Packaging, Inc. v. Travelers Property
Casualty Company of America*
No. 2:12-CV-4418 - WHW-SCM

Dear Judge Mannion:

We represent Gregory Packaging, Inc. ("Gregory Packaging") in the above-referenced matter and submit this letter together with Travelers Property Casualty Company of America ("Travelers") as required by the Amended Scheduling Order (defined below).

Both Gregory Packaging and Travelers exchanged interrogatories and document requests on May 6, 2013 per the deadline established in the Initial Scheduling Order. By letter dated May 31, 2013 both parties requested that the Court grant additional time to answer the written discovery and to extend the remaining deadlines in this case accordingly. On June 5, 2014, this Court entered the Order on Informal Motion to Amend the Scheduling Order and the Amended Scheduling Order (the "Amended Scheduling Order"). The Amended Scheduling Order extended the fact discovery deadline to October 4, 2013, but did not specifically amend the deadline for exchange of written discovery. Subsequently, the parties met and conferred to determine a specific deadline for the exchange of discovery. During this conference, we informed Travelers that we had recently learned that our client's mother had passed away and this was the cause of Gregory Packaging's delay in response to discovery. Plaintiff expects, however, that it will be able to produce documents and respond to interrogatories in the coming weeks. Accordingly, the parties agreed to respond to outstanding discovery by July 19, 2013.

Travelers previously issued five Notices of Deposition to Gregory Packaging. Assuming that there are no issues in adhering to the parties' July 19, 2013 deadline for the exchange of written discovery responses, the parties have agreed to

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reschedule the depositions to occur in August and/or September, pending the deponents' availability.

Thank you for your attention to this matter. We look forward to the telephone conference with Your Honor at 10:30 a.m. on Monday, June 24, 2013.

Respectfully submitted,

A handwritten signature in blue ink that reads "Robert D. Chesler" followed by a stylized monogram or flourish.

Robert D. Chesler, Esq.

cc: Robert F. Cossolini, Esq. (via email)
Dana M. LaScala, Esq. (via email)